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March 1, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: **Suddenlink Communications**
Annual Customer Proprietary Network Information (“CPNI”) Certification
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Suddenlink Communications (specific entities listed in the attached document) and pursuant to Section 64.2009(e) of the Commission’s rules,^{1/} attached please find Suddenlink Communications’ Annual CPNI Certification covering calendar year 2018.

Should you have any questions, please contact the undersigned at 202-434-7440.

Respectfully submitted,

/s/ Radhika Bhat

Radhika Bhat
Counsel to Suddenlink Communications

^{1/} 47 C.F.R. § 64.2009(e).

SUDDENLINK COMMUNICATIONS

ANNUAL 47 C.F.R. § 64.2009(e) CPNI CERTIFICATION

EB DOCKET 06-36

Annual Section 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018.

Name of company(s) covered by this certification and Form 499 Filer IDs (where applicable):

Cebridge Telecom CA, LLC	825751	Cebridge Telecom TX, LP	818512
Cebridge Telecom KS, LLC	830294	Cebridge Telecom VA, LLC	831163
Cebridge Telecom KY, LLC	830292	Cebridge Telecom WV, LLC	825824
Cebridge Telecom LA, LLC	825750	Cequeel Communications, LLC	827243
Cebridge Telecom MO, LLC	825752	Cequeel III Communications II, LLC	826101
Cebridge Telecom MS, LLC	830293	Friendship Cable of Arkansas, Inc.	826100
Cebridge Telecom NC, LLC	825911	TCA Communications, LLC	801646
Cebridge Telecom NM, LLC	830291	Orbis1, LLC	823400
Cebridge Telecom OH, LLC	830290	NPG Digital Phone, LLC	826069
Cebridge Telecom OK, LLC	825753	Mercury Voice and Data, LLC	826249
Cebridge Telecom Limited, LLC			
Cebridge Acquisition, LP (owner of cable systems)			
Cebridge Acquisition, LLC (owner of cable systems)			

Name of signatory: Gregory Graff

Title of signatory: EVP Altice Consumer Services

I, Gregory Graff, certify that I am an officer of the companies named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's") Customer Proprietary Network Information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. *See* 47 C.F.R. § 64.2009(e).

The Company did not receive any customer complaints during the above-referenced certification period concerning the unauthorized release of customer CPNI.

The Company has not taken any actions (*i.e.* proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission) against data brokers during the above-referenced certification period. The Company also has no knowledge or experience regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company is taking to protect CPNI are described in the attached statement that summarizes the Company's operating procedures for compliance with the Commission's CPNI rules.

Dated: 02/25/2019

Signed: _____

Gregory Graff

EVP Altice Consumer Services

**STATEMENT PURSUANT TO 47 C.F.R. SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")**

The companies defined above ("Suddenlink") are committed to protecting the privacy of its customers' confidential and proprietary information and has established operational policies to protect CPNI. The following statement explains the operational policies of Suddenlink to ensure that it is in compliance with the CPNI rules of the Federal Communications Commission ("Commission" or "FCC").

First, as to the use of CPNI for marketing purposes, Suddenlink does not use CPNI for the purpose of marketing service offerings among the different categories of service that the Suddenlink provides to subscribers. Suddenlink does, however, use CPNI to market service offerings among the same category of service to which the customer already subscribes.

Second, Suddenlink will only release or disclose CPNI to a third party with the customer's written consent or pursuant to a valid request from law enforcement, the federal judiciary or other appropriate authority. For example, without the customer's written consent, customer information will only be disclosed after the requesting party demonstrates that the request is made pursuant to a valid subpoena, court order, search warrant or other legally authorized request.

Third, Suddenlink will only release CPNI to third party vendors pursuant to a written agreement containing the appropriate restrictions regarding the confidentiality and safeguarding of customer information, and then only for the limited purpose of initiating, rendering, billing and/or collecting for services rendered to Suddenlink subscribers.

Fourth, Suddenlink customer service agents do not discuss call detail information over the phone unless (1) the customer is able to provide call detail information to the agent without the agent's assistance; (2) the customer provides a customer-initiated password that was established without using account information or readily available biographical information; or (3) the agent calls the customer at the telephone number of record.

Fifth, Suddenlink does not provide online access to any CPNI until the customer requesting such access provides a password that has been established by the customer without the use of readily available biographical information or account information.

Sixth, Suddenlink does not disclose CPNI to a customer at a retail location until the customer presents a valid photo ID matching the customer's account information.

Seventh, Suddenlink adopts the following operating procedures to ensure compliance with CPNI regulations:

- A) The publication and circulation of a CPNI Compliance Policy.
- B) Regular recurring training program concerning the use and disclosure of CPNI.
- C) The implementation and administration of an employee disciplinary program, including penalties for the violation of the CPNI Compliance Policy or termination of employment where appropriate.
- D) Physical and software based security systems limiting employee access to CPNI.
- E) The maintenance of records when CPNI is released to third parties (such release occurring only pursuant to valid request from law enforcement, the federal judiciary or other appropriate authority). Such records are retained for at least one year.
- F) The use of internal review processes to ensure that the release of subscriber list information is made only to persons using such information for the purpose of publishing directories.